

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	CASE NUMBER:
§	
§	23-90147 (DRJ)
§	(Chapter 11)
§	
DEBTORS¹	(Jointly Administered)

**EMERGENCY APPLICATION OF THE UNITED STATES TRUSTEE
FOR ORDER APPROVING APPOINTMENT OF CHAPTER 11 TRUSTEE**

TO THE HONORABLE DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE:

Kevin M. Epstein, the United States Trustee for Region 7 (the “Applicant”), hereby applies to the Court pursuant to Fed. R. Bankr. P. 2007.1(c) for an order approving the appointment of Janet S. Northrup as chapter 11 trustee, and in support thereof, states as follows:

1. On August 16, 2023, the Court entered the *Order Directing the Appointment of a Chapter 11 Trustee*. See Dkt. No. 1284.
2. The Applicant has appointed Janet S. Northrup (“Northrup”) to serve as chapter 11 trustee. Northrup is an attorney licensed to practice in the State of Texas. She is of counsel at Hughes Watters & Askanase, LLP, which is located at Total Plaza, 1201 Louisiana Street, Houston, Texas, 77002. Her telephone number is (713) 759-0818. She is also a chapter 7 trustee in the Southern District of Texas. The Applicant has selected Northrup because she is well qualified to serve as chapter 11 trustee. She has the knowledge and experience required to fulfill the duties of a chapter 11 trustee in these chapter 11 cases.

¹ A complete list of each of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company’s principal place of business and the Debtors’ service address in these Chapter 11 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

3. Counsel for the Applicant has consulted with the following parties in interest regarding the appointment of a chapter 11 trustee:

- a. Committee of Unsecured Creditors, by and through Attorney Charles R. Gibbs.
- b. First Horizon Bank, as Administrative Agent, by and through Attorneys John D. Elrod and Shari L. Heyen.
- c. The Debtors, by and through attorney Jeff Pomerantz.

4. To the best of the Applicant's knowledge, Northrup's connections with the Debtors, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, and persons employed in the Office of the United States Trustee, are limited to the connections set forth in the Verified Statement filed in support of this Application.

WHEREFORE, Applicant requests that the Court enter an order approving the appointment of Janet S. Northrup as chapter 11 trustee in the above-captioned cases.

Dated: August 16, 2023

Respectfully Submitted,

KEVIN M. EPSTEIN
UNITED STATES TRUSTEE
REGION 7, SOUTHERN
DISTRICT OF TEXAS

By: /s/ C. Ross Travis
C. Ross Travis
LA Bar No. 40083
515 Rusk, Suite 3516
Houston, Texas 77002
(713) 718-4650
(713) 718-4670 Fax
C.Ross.Travis@usdoj.gov Email

CERTIFICATION

The undersigned hereby certifies that, to the best of my knowledge, information and belief, the factual statements in the foregoing pleading are accurate.

/s/ C. Ross Travis
C. Ross Travis

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic means on all PACER participants on this 17th day of August, 2023.

/s/ C. Ross Travis
C. Ross Travis